

# **EXHIBIT W**

1 IN THE UNITED STATES BANKRUPTCY COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK  
3  
4 )  
5 In re: )  
6 MOTORS LIQUIDATION COMPANY, et ) Chapter 11  
7 al., f/k/a General Motors )  
8 Corporation, et al., ) Case No.  
9 Debtors, ) 09-50026 (REG)  
10 )  
11 )  
12 )  
13 )  
14 )  
15 )  
16 )  
17 )  
18 )  
19 )  
20 )  
21 )  
22 )  
23 )  
24 )  
25 )

DEPOSITION OF MAURITA SUTEDJA

May 31, 2012

Seattle, Washington

ELISA DREIER  
REPORTING CORP.

950 Third Avenue  
New York, New York 10022

Telephone: 212-557-5558  
Fax: 212-557-0050  
Email: production@courtreportingdrc.com

1 APPEARANCES

2 For GUC Trust:

3 Katie L. Cooperman, Esq.  
4 Hillary R. Gardner, Esq.  
5 Eric B. Fisher, Esq.  
6 Dickstein Shapiro LLP  
7 1633 Broadway  
8 New York, NY 10019-6708

9 For General Motors LLC:

10 Arthur J. Steinberg, Esq.  
11 King & Spalding LLP  
12 1185 Avenue of the Americas  
13 New York, NY 10036-4003

14 Lawrence S. Buonomo, Esq.  
15 GM Office of the General Counsel  
16 400 Renaissance Center  
17 PO Box 400  
18 Detroit, MI 48265-4000

19 For Nova Scotia Noteholders, Elliott Associates,  
20 Morgan Stanley, and Fortress:

21 Kevin D. Finger, Esq.  
22 Bevin Brennan, Esq.  
23 Gary D. Ticoll, Esq. (via phone)  
24 John H. Bae, Esq. (via phone)  
25 Greenberg Traurig  
77 West Wacker Drive  
Suite 2500  
Chicago, IL 60601

1 APPEARANCES (CONTINUED)

2

3

For Green Hunt Wedlake Inc.:

4

Dean L. Chapman, Esq.

Akin Gump Strauss Hauer & Feld LLP

5

One Bryant Park

New York, NY 10036-6745

6

7

8

For Appaloosa (via phone):

9

Maria E. Douvas, Esq.

10

Paul Hastings LLP

75 East 55th Street

11

New York, NY 10022

12

13

14

15

16

17

18

19

20

21

22

23

24

25

4

1	EXAMINATION INDEX	
2	EXAMINATION BY:	PAGE NO.
3	MS. COOPERMAN	8

4

5	EXHIBIT INDEX		
6	EXHIBIT NO.	DESCRIPTION	PAGE NO.

7

8	Exhibit No. 1	2-page e-mail and attachment from Mr. Holy, dated 2/22/09, MS&CO_GM_A 0002389, and attachment.	19
---	---------------	---	----

9

10

11	Exhibit No. 2	3-page "Canadian 363," dated 4/17/09, UST 000001-3.	29
----	---------------	--	----

11

12	Exhibit No. 3	24-page e-mail and attachment from Mr. Mistry, dated 4/30/09, NGM 20431-54.	37
----	---------------	---	----

13

14	Exhibit No. 4	4-page e-mail chain, NGM 6147-50.	64
----	---------------	--------------------------------------	----

15

16	Exhibit No. 5	1-page e-mail chain, NGM 6151.	67
----	---------------	-----------------------------------	----

16

17	Exhibit No. 6	4-page e-mail and attachment from Ms. Sutedja, dated 5/13/09, NGM 20547-50.	71
----	---------------	---	----

18

19	Exhibit No. 7	3-page e-mail chain, NGM 6430-32.	76
----	---------------	--------------------------------------	----

20

21	Exhibit No. 8	7-page e-mail chain and attachment, NGM 6435-41.	81
----	---------------	---	----

21

22	Exhibit No. 9	3-page e-mail chain and attachment, NGM 6435 and attachment.	81
----	---------------	--	----

23

24	Exhibit No. 10	1-page e-mail chain, NGM 6433.	86
----	----------------	-----------------------------------	----

25

1	EXHIBIT INDEX (CONTINUED)		
2			
3	Exhibit No. 11	2-page e-mail chain, NGM 6450-51.	88
4	Exhibit No. 12	2-page e-mail chain, NGM 6452-53.	90
5			
6	Exhibit No. 13	2-page e-mail chain, NGM 13190-91.	95
7	Exhibit No. 14	3-page e-mail chain, NGM 9118-20.	97
8			
9	Exhibit No. 15	2-page e-mail chain, NGM 9123-24.	100
10	Exhibit No. 16	2-page e-mail chain, NGM 9127-28.	102
11			
12	Exhibit No. 17	12-page e-mail chain with attachment, NGM 20632-43.	107
13	Exhibit No. 18	5-page e-mail chain, NGM 13346-50.	113
14			
15	Exhibit No. 19	4-page e-mail chain, NGM 13383-86.	117
16	Exhibit No. 20	12-page e-mail and attachment from Ms. Zhou, dated 5/29/09, NGM 595-606.	119
17			
18	Exhibit No. 21	3-page e-mail chain, NGM 636-38.	125
19			
20	Exhibit No. 22	2-page e-mail chain, NGM 10782-83.	134
21	Exhibit No. 23	4-page e-mail chain, NGM 23410-13.	135
22			
23	Exhibit No. 24	29-page e-mail and attachment from Mr. Godhard, dated 6/1/09, WGM 791-819.	137
24			
25			

6

1 EXHIBIT INDEX (CONTINUED)

2

Exhibit No. 25 4-page e-mail chain, 141  
NGM 17397-400.

3

4 Exhibit No. 26 9-page "SEC filing," Form 8-K, 143  
AUR\_GMO14277-85.

5

Exhibit No. 27 2-page e-mail chain, 145  
NGM 4619-20.

6

7 Exhibit No. 28 1-page e-mail chain, 146  
NGM 14119.

8

Exhibit No. 29 3-page e-mail chain, 152  
NGM 14916-18.

9

10 Exhibit No. 30 3-page e-mail chain, 153  
NGM 15018-20.

11

12 Exhibit No. 31 2-page accounting memo - draft, 155  
dated 7/8/09,  
NGM 17558-59.

13

Exhibit No. 32 13-page e-mail chain and 157  
attachment, NGM 7281-93.

14

15 Exhibit No. 33 17-page letter to 158  
Mr. Wedlake, with enclosures,  
dated 11/10/09, GHW 4657-73.

16

17 Exhibit No. 34 12-page e-mail chain and 160  
attachment, GHW 6240-51.

18

Exhibit No. 35 10-page e-mail chain, 166  
AUR\_GMO39690-R (05-2012) to  
699.

19

20 Exhibit No. 36 2-page e-mail and attachment to 166  
Mr. Wedlake, dated 11/3/09, GHW  
1374-75.

21

22 Exhibit No. 37 17-page e-mail chain and 168  
attachment, NGM 16047-63.

23

24

25

1 EXHIBIT INDEX (CONTINUED)

2

3 Exhibit No. 38 9-page e-mail chain and 168  
4 attachments, NGM 16047-52 plus  
5 attachment.

6

7 Exhibit No. 39 1-page e-mail chain, 172  
8 NGM 4116.

9 Exhibit No. 40 4-page e-mail and attachment 175  
10 from Mr. Golick, dated 1/15/10,  
11 NGM 16215-18.

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29



8

1 BE IT REMEMBERED that on Thursday, May  
2 31, 2012, at 1001 Fourth Avenue, Suite 4500, Seattle,  
3 Washington, at 9:09 a.m., before Terilynn Pritchard,  
4 Certified Court Reporter, CCR, RMR, CRR, CLR, appeared  
5 MAURITA SUTEDJA, the witness herein;

6 WHEREUPON, the following proceedings  
7 were had, to wit:

8

9 <<<<<< >>>>>>

10

11 MAURITA SUTEDJA, having been first duly sworn  
12 by the Certified Court Reporter,  
13 testified as follows:

14

15 EXAMINATION

16 BY MS. COOPERMAN:

17 Q Good morning, Ms. Sutedja. My name is Katie Cooperman,  
18 and I'm with the law firm of Dickstein Shapiro, and we  
19 represent the GUC Trust in the GMC bankruptcy  
20 proceedings.

21 I am going to ask you a number of questions today,  
22 and if you don't understand the question, just let me  
23 know, and I'll be happy to rephrase.

24 A Okay.

25 Q If at any point you would like to take a break, just let

122

1 agreement this 2A refers to?

2 MR. STEINBERG: Objection; foundation.

3 THE WITNESS: I don't remember.

4 Q (By Ms. Cooperman) Do you know whether a lockup  
5 agreement was entered into on or before 11:30 p.m. EST on  
6 May 31, 2009?

7 A We reached a settlement with the bondholders early in the  
8 morning. I can't remember-- before the bankruptcy  
9 filing.

10 Q And which morning are you referring to?

11 A When was the bankruptcy?

12 MR. STEINBERG: June 1.

13 THE WITNESS: June 1.

14 Q (By Ms. Cooperman) Do you know when in the morning on  
15 June 1 you reached a settlement with the bondholders?

16 A Around 6 or 7.

17 Q And how do you remember that it was around 6 or 7 in the  
18 morning?

19 MR. STEINBERG: Objection; vague.

20 THE WITNESS: Can you be more  
21 specific?

22 Q (By Ms. Cooperman) Did you look at your watch?

23 A I looked at my watch.

24 Q And what time did it say on your watch?

25 A We were working through the night, so I looked at my

1 STATE OF WASHINGTON ) I, Terilynn Pritchard, RMR, CRR,  
2 ) ss CLR, a certified court reporter  
3 County of Pierce ) in the State of Washington, do  
4 hereby certify:

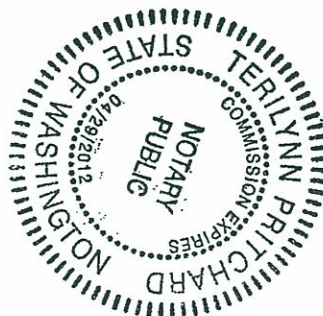
5 That the foregoing deposition of MAURITA SUTEDJA  
6 was taken before me and completed on May 31, 2012, and  
7 thereafter was transcribed under my direction; that the  
8 deposition is a full, true and complete transcript of the  
9 testimony of said witness, including all questions, answers,  
10 objections, motions and exceptions;

11 That the witness, before examination, was by me  
12 duly sworn to testify the truth, the whole truth, and  
13 nothing but the truth, and that the witness was not asked at  
14 the deposition regarding signature, so signature will be  
15 reserved;

16 That I am not a relative, employee, attorney or  
17 counsel of any party to this action or relative or employee  
18 of any such attorney or counsel and that I am not  
19 financially interested in the said action or the outcome  
20 thereof;

21 That I am herewith securely sealing the said  
22 deposition and promptly delivering the same to  
23 Attorney Katie L. Cooperman.

24 IN WITNESS WHEREOF, I have hereunto set my  
25 signature on the 1st day of June, 2012.



Terilynn Pritchard, CCR, RMR, CRR, CLR  
Certified Court Reporter No. 2047.